



BellSouth Telecommunications, Inc.

333 Commerce Street  
Suite 2101  
Nashville, TN 37201-3300

guy.hicks@bellsouth.com

REC'D TH  
REGULATORY AUTH.

June 19, 2000  
1:00 JUN 19 PM 1 69  
OFFICE OF THE  
EXECUTIVE SECRETARY  
Guy M. Hicks  
General Counsel  
615-214-6301  
Fax 615-214-7406

VIA HAND DELIVERY

David Waddell, Executive Secretary  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37238

Re: *Petition for Arbitration of the Interconnection Agreement Between BellSouth Telecommunications, Inc. and Intermedia Communications Inc. Pursuant to Section 252(b) of the Telecommunications Act of 1996*  
Docket No. 99-00948

Dear Mr. Waddell:

Enclosed are the original and thirteen copies of BellSouth Telecommunications, Inc.'s First Request for Production of Documents to Intermedia Communications, Inc. Copies of the enclosed are being provided to counsel of record for all parties.

Very truly yours,

  
Guy M. Hicks

GMH:ch  
Enclosure

**BEFORE THE TENNESSEE REGULATORY AUTHORITY  
Nashville, Tennessee**

**IN RE:**    *Petition for Arbitration of the Interconnection Agreement Between BellSouth Telecommunications, Inc. and Intermedia Communications, Inc. Pursuant to Section 252(b) of the Telecommunications Act of 1996*

**Docket No. 99-00948**

**BELLSOUTH TELECOMMUNICATIONS, INC.'S FIRST REQUEST FOR  
PRODUCTION OF DOCUMENTS TO INTERMEDIA COMMUNICATIONS, INC.**

BellSouth Telecommunications, Inc. ("BellSouth") hereby requests Intermedia Communications, Inc. ("Intermedia") to furnish documents in response to the following Requests for Production within fifteen (15) days of service hereon, or by July 5, 2000.

**INSTRUCTIONS**

(a)    If any response required by way of answer to these Requests for Production is considered to contain confidential or protected information, please furnish this information subject to the protective order entered in this proceeding.

(b)    If any document is withheld under a claim of privilege, please furnish a list of each document for which the privilege is claimed, reflecting the name and address of the person who prepared the document, the date the document was prepared, each person who was sent a copy of the document, each person who has viewed or who has had custody of a copy of the document, and a statement of the basis on which the privilege was claimed.

(c)    These Requests for Production are to be answered with reference to all information in your possession, custody or control or reasonably available to you. These Requests for Production are intended to include requests for information that is physically within Intermedia's possession, custody or control as well as in the possession, custody or control of

Intermedia's agents, attorneys, or other third parties from which such documents may be obtained.

(d) If any Request for Production cannot be responded in full, answer to the extent possible and specify the reason for your inability to respond fully. If you object to any part of a Request for Production, answer all parts of the request to which you do not object, and as to each part to which you do object, separately set forth this specific basis for the objection.

(e) These Requests for Production are continuing in nature and require supplemental responses should information unknown to you at the time you serve your responses to these requests subsequently become known or should your initial response be incorrect or untrue.

#### **DEFINITIONS**

(a) "Intermedia" means Intermedia Communications, Inc., any predecessors in interest, its parent, subsidiaries, and affiliates, their present and former officers, employees, agents, directors, and all other persons acting or purporting to act on behalf of Intermedia.

(b) "You" and "your" refer to Intermedia.

(c) "Person" means any natural person, corporation, corporate division, partnership, other unincorporated association, trust, government agency, or entity.

(d) "And" and "or" shall be construed both conjunctively and disjunctively, and each shall include the other whenever such construction will serve to bring within the scope of these Interrogatories information that would not otherwise be brought within their scope.

(e) "Identification" or "identify" when used in reference to: (i) a natural individual, requires you to state his or her full name and residential and business address; (ii) a corporation, requires you to state its full corporate name and any names under which it does business, the state of incorporation, and the address of its principal place of business; (iii) a document, requires you to

state the number of pages and the nature of the document (e.g., a letter or memorandum), its title, its date, the name or names of its authors and recipients, and its present location or custodian; (iv) a communication, requires you, if any part of the communication was written, to identify the document or documents which refer to or evidence the communication, and to the extent that the communication was not written, to identify the persons participating in the communication and to state the date, manner, place, and substance of the communication.

(f) "Arbitration Petition" refers to the petition filed by BellSouth on December 7, 1999, 2000, requesting arbitration under Section 252(b) of the Communications Act of 1934, as amended by the Telecommunications Act of 1996 ("Act").

### **REQUESTS FOR PRODUCTION**

1. Produce copies of all documents identified in response to BellSouth's First Set of Interrogatories to Intermedia.

2. Produce all documents that support or refer or relate to the recurring and nonrecurring rates you contend BellSouth should charge Intermedia for frame relay elements necessary to provide packet-switched services in Tennessee, including the User-to-End Network Interface, Network-to-Network Interface, and the Data Link Control Identifiers and Committed Information Rates.

3. Produce all documents that refer or relate or pertain to Intermedia's contention that its switch(es) serve a geographic area comparable to BellSouth's tandem switch.

Produce all documents that refer, relate or pertain to the tandem switching functions allegedly performed by Intermedia's switch(es) in Tennessee.

4. Produce all documents that refer or relate to Intermedia's claim that for purposes of reciprocal compensation, Intermedia should be compensated for end office, tandem, and

transport elements of termination where Intermedia's switch serves a geographic area comparable to the area served by BellSouth's tandem switch.

5. Produce copies of all agreements between Intermedia and an Incumbent Local Exchange Carrier (other than BellSouth) under Section 252 of the Act, whether the agreement was reached through voluntary negotiation or compulsory arbitration.

6. Produce all documents upon which Intermedia intends to rely or introduce into evidence at the hearing on this matter.

7. Produce any and all cost studies, evaluations, reports or analyses prepared by or for Intermedia concerning any issue raised by Intermedia in the Arbitration Petition.

8. Produce documents sufficient to reflect the location of Intermedia's end-users in relation to Intermedia's switch(es).

9. Produce any cost studies for establishing prices for the new UNEs in the FCC's *UNE Remand Order*.

Respectfully submitted,

BELLSOUTH TELECOMMUNICATIONS, INC.



GUY M. HICKS

333 Commerce Street, Suite 2101  
Nashville, Tennessee 37201-3300  
(615) 214-6301

R. DOUGLAS LACKEY  
A. LANGLEY KITCHINGS  
675 West Peachtree Street, N.E.  
Suite 4300  
Atlanta, Georgia 30375

**CERTIFICATE OF SERVICE**

I hereby certify that on June 19, 2000, a copy of the foregoing document was served on the parties of record, via the method indicated:

☒ Hand  
☐ Mail  
☐ Facsimile  
☐ Overnight

Richard Collier, Esquire  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37243-0500

☐ Hand  
☒ Mail  
☐ Facsimile  
☐ Overnight

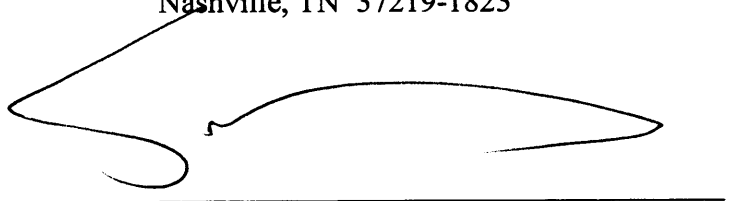
Carl Jackson, Senior Director  
Intermedia Communications, Inc.  
360 Interstate North Parkway, Suite 500  
Atlanta, GA 30339

☐ Hand  
☒ Mail  
☐ Facsimile  
☐ Overnight

Scott Saperstein  
Senior Policy Counsel  
Intermedia Communications, Inc.  
3625 Queen Palm Drive  
Tampa, FL 33619

☐ Hand  
☒ Mail  
☐ Facsimile  
☐ Overnight

H. LaDon Baltimore, Esquire  
Farrar & Bates  
211 Seventh Ave. N, # 320  
Nashville, TN 37219-1823



---